

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

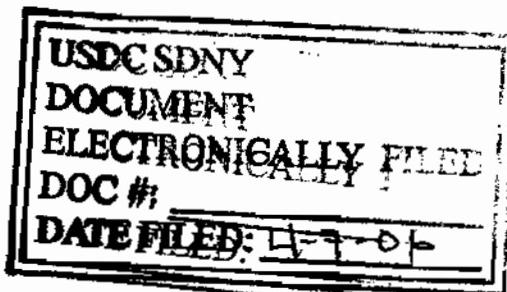
In Re Terrorist Attacks on September 11, 2001) 03 MDL No. 1570 (RCC)
) ECF Case

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that upon the Affidavit of David E. Nachman sworn to April 6, 2006, the Affidavit of Sheldon Krantz sworn to April 5, 2006, the Affidavit of Rachel Tausend sworn to April 5, 2006 and all attachments thereto, the undersigned will and hereby does move this Court, on submission, before the Honorable Richard C. Casey for an order pursuant to General Rule 1.3(c) of this Court granting Sheldon Krantz and Rachel Tausend admission *pro hac vice* in this matter.

PLEASE TAKE FURTHER NOTICE that in making this Notice, defendant Abdullah Bin Khalid Al-Thani expressly preserve all defenses, including, but not limited to, subject matter jurisdiction, personal jurisdiction and venue.

Dated: New York, New York
April 7, 2006



DLA PIPER RUDNICK GRAY CARY US LLP

By: 

David E. Nachman (DN-6684)
1251 Avenue of the Americas
New York, New York 10020
(212) 835-6000

Attorneys for Defendant
Abdullah Bin Khalid Al-Thani

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Terrorist Attacks on September 11, 2001) 03 MDL No. 1570 (RCC)
) ECF Case

**AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE
OF SHELDON KRANTZ AND RACHEL TAUSEND**

STATE OF NEW YORK)
)
 ss:
COUNTY OF NEW YORK)

DAVID E. NACHMAN, being duly sworn, states:

1. I am a partner in the law firm of DLA Piper Rudnick Gray Cary US LLP, attorneys for defendant Abdullah Bin Khalid Al-Thani in this matter. I have been a member in good standing of the Bar of the State of New York since 1982. I was admitted to practice in the United States District Court for the Southern District of New York on April 27, 1982. I am also a member of the Bars of the United States District Courts for the Eastern District of New York and the Northern District of California, the United States Court of Appeals for the Second Circuit and the United States Supreme Court.

2. I respectfully submit this affidavit in support of the motion pursuant to General Rule 1.3(c) of this Court for admission *pro hac vice* of Sheldon Krantz and Rachel Tausend of DLA Piper Rudnick Gray Cary US LLP.

3. I have known and worked with Mr. Krantz and Ms. Tausend professionally for more than a year and believe both of them to be of high moral character and highly competent in the practice of law.

4. Mr. Krantz is a member in good standing of the bars of the states of California, Massachusetts and Nebraska and the District of Columbia and has been a member in good standing

in the courts of those jurisdictions since 1988, 1970, 2002 and 1990, respectively. Mr. Krantz's certificate of good standing from the District of Columbia is attached to his accompanying affidavit.

5. Mr. Krantz also has been admitted to practice before the United States Court of Appeals for the Sixth Circuit and the United States Supreme Court.

6. Ms. Tausend is a member in good standing of the bars of the Commonwealth of Virginia and the District of Columbia and has been a member in good standing in the courts of those jurisdictions since 2001 and 2002, respectively. Ms. Tausend's certificate of good standing from the District of Columbia is attached to her accompanying affidavit.

7. Ms. Tausend also has been admitted to practice before the United States District Court for the Eastern District of Virginia and the United States Court of Appeals for the Fourth Circuit.

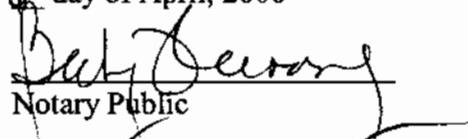
8. I am fully familiar with the facts of this case and will assist Mr. Krantz and Ms. Tausend in the preparation of this case.

WHEREFORE, I respectfully request that the Court admit Sheldon Krantz and Ms. Tausend *pro hac vice* and thereby permit them to appear and to participate in all further proceedings in this case.



David E. Nachman (DN-6684)

Sworn to before me this
4 day of April, 2006



Notary Public

BECKY HERNANDEZ
Notary Public, State Of New York
No. 01HE6014791
Qualified In Bronx County
Commission Expires October 19, 2005

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Terrorist Attacks on September 11, 2001) 03 MDL No. 1570 (RCC)
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**AFFIDAVIT OF SHELDON KRANTZ IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

DISTRICT OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Sheldon Krantz, being duly sworn, states:

1. I submit this application in support of the application by defendant Abdullah Bin Khalid Al-Thani for my admission as an attorney *pro hac vice* in this matter.

2. I am a citizen of the United States and a resident of the District of Columbia. I am a partner in the law firm of DLA Piper Rudnick Gray Cary US LLP, attorneys for defendant Abdullah Bin Khalid Al-Thani in the pending litigation. I have been a member in good standing of the bars of the states of California, Massachusetts and Nebraska since 1988, 1970 and 2002 respectively, and the Bar of the District of Columbia since 1990. My certificate of good standing from the District of Columbia is attached as Exhibit A to this affidavit.

3. I am also admitted to practice before the United States Court of Appeals for the Sixth Circuit and the United States Supreme Court. I am not currently suspended or disbarred in any other courts.

4. I have never been held in contempt of Court, nor have I ever been censured, suspended or disbarred by any court.

5. I have read and am familiar with:

(a) the provisions of the Judicial Code which pertain to the jurisdiction of, and

practice in, the United States District Courts;

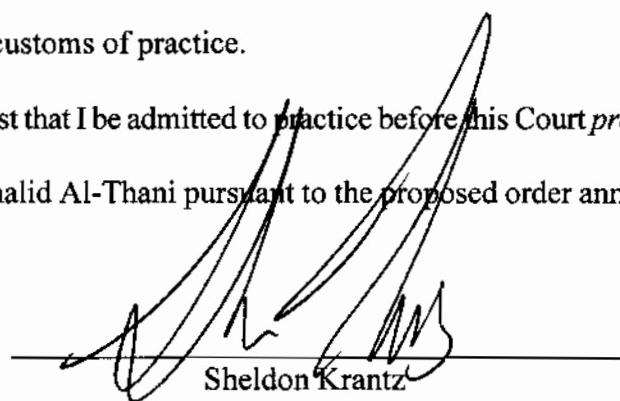
- (b) the Federal Rules of Civil Procedure;
- (c) the Federal Rules of Evidence;
- (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York; and
- (e) the Code of Professional Responsibility of the American Bar Association,

and will faithfully adhere thereto.

6. As a part of my admission *pro hac vice*, I agree:

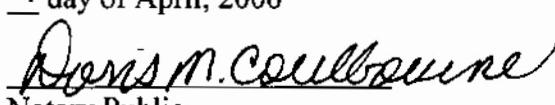
- (a) to be bound by all procedural rules and disciplinary rules governing the practice of law before this Court;
- (b) to advise the Court if I cease to be a member in good standing of the bars of the states of California, Massachusetts and Nebraska and the District of Columbia;
- (c) to continue to work with New York counsel throughout the course of this case; and
- (d) to follow New York customs of practice.

WHEREFORE, I respectfully request that I be admitted to practice before this Court *pro hac vice* on behalf of defendant Abdullah Bin Khalid Al-Thani pursuant to the proposed order annexed hereto.

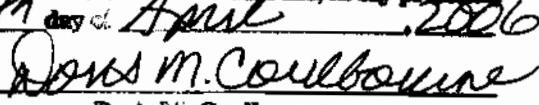


Sheldon Krantz

Sworn to before me this
5th day of April, 2006


Doris M. Coulbourne
Notary Public

District of Columbia, DC
Subscribed and sworn to before me, in my presence,
this 5th day of April, 2006


Doris M. Coulbourne
Notary Public, District of Columbia



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

SHELDON KRANTZ

was on the 4TH day of JULY, 1990

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on April
4, 2006.

GARLAND PINKSTON, JR., CLERK

A handwritten signature in black ink, appearing to read "G. Jackson".
By: _____
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**AFFIDAVIT OF RACHEL TAUSEND IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

DISTRICT OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

Rachel Tausend, being duly sworn, states:

1. I submit this application in support of the application by defendant Abdullah Bin Khalid Al-Thani for my admission as an attorney *pro hac vice* in this matter.

2. I am a citizen of the United States and a resident of the District of Columbia. I am an associate in the law firm of DLA Piper Rudnick Gray Cary US LLP, attorneys for defendant Abdullah Bin Khalid Al-Thani in the pending litigation. I have been a member in good standing of the bars of the Commonwealth of Virginia and the District of Columbia since 2001 and 2002, respectively. My certificate of good standing from the District of Columbia is attached as Exhibit A to this affidavit.

3. I am also admitted to practice before the United States District Court for the Eastern District of Virginia and the United States Court of Appeals for the Fourth Circuit. I am not currently suspended or disbarred in any other courts.

4. I have never been held in contempt of Court, nor have I ever been censured, suspended or disbarred by any court.

5. I have read and am familiar with:

(a) the provisions of the Judicial Code which pertain to the jurisdiction of, and

practice in, the United States District Courts;

- (b) the Federal Rules of Civil Procedure;
- (c) the Federal Rules of Evidence;
- (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York; and
- (e) the Code of Professional Responsibility of the American Bar Association,

and will faithfully adhere thereto.

6. As a part of my admission *pro hac vice*, I agree:

- (a) to be bound by all procedural rules and disciplinary rules governing the practice of law before this Court;
- (b) to advise the Court if I cease to be a member in good standing of the bars of the Commonwealth of Virginia and the District of Columbia;
- (c) to continue to work with New York counsel throughout the course of this case; and
- (d) to follow New York customs of practice.

WHEREFORE, I respectfully request that I be admitted to practice before this Court *pro hac vice* on behalf of defendant Abdullah Bin Khalid Al-Thani pursuant to the proposed order annexed hereto.

Rachel Tausend

Rachel Tausend

Sworn to before me this
5th day of April, 2006

Doris M. Coulbourne
Notary Public

District of Columbia: SS
Subscribed and sworn to before me, in my presence,
this 2nd day of April 2006

Doris M. Coulbourne
Doris M. Coulbourne
Notary Public, District of Columbia



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

RACHEL M. TAUSEND

was on the 10th day of MAY, 2002

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on April 4, 2006.

GARLAND PINKSTON, JR., CLERK

By: A handwritten signature in black ink, appearing to read "G. Jackson".
Deputy Clerk

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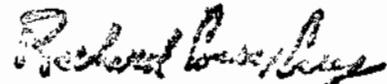
**PROPOSED ORDER FOR ADMISSION *PRO HAC VICE*
OF SHELDON KRANTZ AND RACHEL TAUSEND**

The Court, having reviewed the Affidavit of David E. Nachman in Support of Motion for Admission *Pro Hac Vice* for Sheldon Krantz and Rachel Tausend sworn to April 6, 2006, the Affidavit of Sheldon Krantz sworn to April 5, 2006, the Affidavit of Rachel Tausend sworn to April 5, 2006, and all attachments thereto, and good cause being alleged therefore, it is hereby

ORDERED, that the admission *pro hac vice* of Sheldon Krantz and Rachel Tausend is granted permitting Mr. Krantz and Ms. Tausend to appear and to participate in all further proceedings in this case as counsel for defendant Abdullah Bin Khalid Al-Thani.

Dated: New York, New York
April 7, 2006

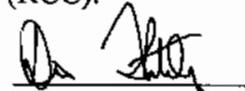
SO ORDERED:



The Honorable Richard C. Casey
United States District Judge

CERTIFICATE OF SERVICE

I, DENNIS THATCHER, being duly sworn, deposes and says: that I am not a party to this action, am over 18 years of age and reside in the State of New York and that on this 7th day of April, 2006, I caused a true and correct copy of the Notice of Motion for Admission *Pro Hac Vice* of Sheldon Krantz and Rachel Tausend and related papers to be served by e-mail upon the attorneys listed in Schedule B of the Case Management Order # 2 in 03 MDL 1570 (RCC).



Dennis Thatcher